

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON, | C17-5806RJB

C17-5806RJB

Plaintiff,

V.

THE GEO GROUP, INC.,

Defendant.

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO
AGUIRRE-URBINA, individually and
on behalf of all those similarly
situated.

C17-5769RJB

Plaintiffs,

COURT'S VOIR DIRE FOR SECOND TRIAL

V.

THE GEO GROUP, INC., a Florida corporation,

Defendant

Dated this 5th day of October, 2021.

Robert F. Bryan

ROBERT J. BRYAN
United States District Judge

(The Court will ask follow-up questions as appropriate)

Swear the panel.

1) Did you all hear my introduction to the case?

2) Is all the information you provided to the Court in writing before today true and correct?

3) Using the Zoom platform for jury selection is a fairly new thing. The COVID-19 pandemic caused us to search out new ways to do things, consistent with safety and health requirements. In this case, after a jury of eight is selected today, the eight jurors chosen will report to the courthouse daily for the trial. We have arranged to use large rooms for jury recesses and deliberations so that social distancing will be practiced. In the courtroom, we have air cleaners and some plexiglass shields, and all participants will be asked to wear masks at all times unless they are speaking or behind glass. This environment requires that all concerned, including jurors, cooperate, promptly report any issues, and use their best efforts to provide a fair trial to all concerned. Are you willing to participate with those things in mind?

4) The lawyers have estimated a two-week trial for the first phase of the case, with another week for the second phase, if necessary. Lawyers and judges only can estimate, and once we start, it will take as long as it takes. Trial will typically be from 9:00 a.m. to noon and 1:00 p.m. to 4 p.m. daily, with morning and afternoon breaks. Is there anything in your life that would make it truly difficult or unfair for you to be a juror on this case?

5) Do any of you have childcare, caregiving or other responsibilities that would make it hard to give your full attention throughout the trial?

6) Do any of you know, or know of, the class plaintiff or any of the lawyers in the case?

7) Have any of you heard of this case before? Source?

8) Does this case remind you in any way of anything in your own life?

1 9) Do any of you know, or know of, anyone on the witness lists read to you?

2 10) Are any of you, or is anyone close to you, involved with the courts or the
3 administration of justice? With law enforcement?

4 11) Do any of you have a relationship with, or particular knowledge about, Immigration
5 and Customs Enforcement Agency, aka “ICE”? With GEO? With the State Department of
6 Labor and Industries or the Attorney General’s Office?

7 12) Do any of you have strong feelings about immigration, immigrants or immigration
8 policy that might cause you to start into the case favoring or disfavoring one side?

9 13) Do any of you have strong feelings about ICE that might cause you to start into the
10 case favoring or disfavoring one side?

11 14) Do any of you have strong feelings about The GEO Group that might cause you to
12 start into the case favoring or disfavoring one side?

13 15) Do any of you have strong feelings about The State of Washington or any of its
14 departments, that might cause you to start into the case favoring or disfavoring one side?

15 16) Do any of you have strong feelings about minimum wage laws, generally, that might
16 cause you to start into the case favoring or disfavoring one side?

17 17) Do any of you have strong feelings about privately-run detention centers that might
18 cause you to start into the case favoring or disfavoring one side?

19 18) Do any of you have strong feelings about class actions that might cause you to start
20 into the case favoring or disfavoring one side?

21 19) Will you accept the law from the Court and apply it, even if you don’t agree with the
22 law?

23 20) Is there anything about this case that would cause you to start the trial with any
24 feelings or concerns favoring or disfavoring either side?

- 1 21) Is there any reason why you might not be able to try this case impartially?
2 22) Is there anything that we have not discussed that makes you want to be excused?

3 Counsel may inquire –

4 The Court will ask for challenges for cause at the end of each panel's voir dire.

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